

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

STATE OF TENNESSEE, ET AL.

Plaintiffs,

v.

**NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,**

Defendant.

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Case No. 3:24-cv-00033-DCLC-DCP

**JOINT STIPULATION REQUESTING EXTENSION OF TIME
TO RESPOND TO THE AMENDED COMPLAINT**

WHEREAS, Plaintiffs the State of Tennessee and the Commonwealth of Virginia filed a Complaint and Motion for Temporary Restraining Order and Preliminary Injunction in this action on January 31, 2024;

WHEREAS, this Court denied the temporary restraining order on February 6, 2024;

WHEREAS, this Court held a preliminary injunction hearing on February 13, 2024;

WHEREAS, this Court granted the preliminary injunction on February 23, 2024;

WHEREAS, the parties jointly stipulated to request an extension of the deadline for Defendant, the National Collegiate Athletic Association, to respond to the Complaint by May 1, 2024;

WHEREAS, the Court granted the parties' joint request for an extension on March 26, 2024; and

WHEREAS, the parties jointly stipulated to a request to establish deadlines for Plaintiffs to amend their Complaint pursuant to Rule 15 of the Federal Rules of Civil Procedure by May 1, 2024, and for Defendant to respond to the Amended Complaint by July 1, 2024; and

WHEREAS, the Court granted the parties' joint request to set certain deadlines;

WHEREAS, Plaintiffs filed an Amended Complaint on May 1, 2024, that included the addition of Plaintiffs the State of Florida, the State of New York, and the District of Columbia;

WHEREAS, the parties jointly stipulated to request an extension of the deadline for Defendant, the National Collegiate Athletic Association, to respond to the Amended Complaint by August 30, 2024;

WHEREAS, the Court granted the parties' joint request for an extension on July 1, 2024;

WHEREAS, the parties jointly stipulated to request an extension of the deadline for Defendant, the National Collegiate Athletic Association, to respond to the Amended Complaint by September 30, 2024;

WHEREAS, the Court granted the parties' joint request for an extension on August 29, 2024;

WHEREAS, the parties jointly stipulated to request an extension of the deadline for Defendant, the National Collegiate Athletic Association, to respond to the Amended Complaint by October 31, 2024;

WHEREAS, the Court granted the parties' joint request for an extension on September 30, 2024; and

WHEREAS, the parties jointly stipulated to request an extension of the deadline for Defendant, the National Collegiate Athletic Association, to respond to the Amended Complaint by December 2, 2024;

WHEREAS, this Court held a status conference on November 14, 2024 to discuss the parties' joint request for an extension;

WHEREAS, the Court granted the parties' joint request for an extension on November 14, 2024; and

WHEREAS, the parties continue to meet and confer in light of the developments in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919 CW (N.D. Cal.), *Hubbard et al. v. National Collegiate Athletic Association et al.*, Case No. 23-cv-01593 (N.D. Cal.), and *Carter et al. v. National Collegiate Athletic Association et al.*, Case No. 3:23-cv-06325-RS (N.D. Cal.).

NOW, THEREFORE, in the interest of efficiency and pursuant to Local Rule 12.1, the parties hereby jointly stipulate and agree that Defendant shall respond to the Amended Complaint by January 10, 2025, and request that the Court enter an order amending that deadline accordingly. Consistent with the discussions with the Court at the last status conference, the parties anticipate being able to make clear by January 10 whether a resolution is possible.

Dated: December 2, 2024

Respectfully submitted,

By: /s/ Cameron T. Norris

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Counsel For Plaintiff the District of Columbia

CERTIFICATE OF CONSENT

In accordance with Rule 6 of the ECF Rules & Procedures for the Eastern District of Tennessee, I hereby certify that I have obtained consent for this electronic filing from the signatories listed above.

Dated: December 2, 2024

Respectfully submitted,

By: /s/ Rakesh N. Kilaru

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